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September 24, 2020

**VIA ECF**

Honorable Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

**Re: *Fuld, et al. v. Palestine Liberation Organization, et al.***  
**Case No. 1:20-cv-03374**

Dear Judge Furman:

This law firm represents the Defendants, Palestine Liberation Organization (“PLO”) and Palestinian Authority (“PA”), in the above-referenced action. Pursuant to Local Civil Rule 7.1(d) and Your Honor’s Individual Rule 1.E, we respectfully move the Court, on consent, for a 30-day extension, from October 9, 2020, to and including November 9, 2020, of Defendant’s time to answer, move with respect to, or otherwise respond to the Plaintiffs’ Amended Complaint (ECF #21, filed September 18, 2020), reserving all of Defendants’ defenses and objections including objections to jurisdiction.

Pursuant to the Court’s Order of August 11, 2020 (ECF #18), Defendants have three weeks from the filing of Plaintiffs’ Amended Complaint to answer or move to dismiss the Amended Complaint, or reassert their original motion to dismiss. Plaintiffs obtained an extension of their original deadline to file their Amended Complaint. *See* ECF #20. Defendants’ three-week response deadline accordingly falls on October 9, 2020, and Defendants’ requested 30-day extension will move Defendants’ response deadline to and including November 9, 2020.<sup>1</sup>

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<sup>1</sup> The 30th day following October 9, 2020, is November 8, 2020, a Sunday, and therefore automatically moves to the next business day pursuant to Fed. R. Civ. P. 6 (a)(1)(C).

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Plaintiffs have consented to this request. This is Defendants' first request for an extension of time to respond to the Amended Complaint. There is currently no appearance scheduled before the Court.

Beyond Plaintiffs' consent, there is good cause for this extension. Plaintiffs' 53-page Amended Complaint is more than twice as long as the original Complaint and adds a significant number of new allegations, including entirely new purported grounds for personal jurisdiction and new substantive allegations. Defendants need additional time to assess and prepare a response to these new allegations, and counsel's ability to communicate with Defendants toward that end is hampered by ongoing difficulties related to the COVID-19 pandemic.

Accordingly, Defendants respectfully request that the Court extend Defendants' time to answer, move with respect to, or otherwise respond to the Amended Complaint in this action until and including November 9, 2020.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

Squire Patton Boggs (US) LLP

/s/ Gassan A. Baloul  
Gassan A. Baloul

cc: All counsel of record (via ECF)